

UNITED STATES DISTRICT COURT

for the

Western District of North Carolina

Division

Stephanie Lynn Hill

Estate of Carol Lynn Hill

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Campus Health Univ. of N.C. at Chapel Hill

Dave DeWito, Perrianne Davis,

Leslie Montano

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:22-cv-664

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Stephanie Lynn Hill

Street Address

7607 Monogram Lane

City and County

Mint Hill, Mecklenburg

State and Zip Code

North Carolina, 28227

Telephone Number

704-713-7428

E-mail Address

jerbey@att.net

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Campus Health, Univ. of NC, at Chapel Hill
320 emergency Room Dr. CB#7470
Chapel Hill, Orange County
N.C. 27599-7470
(919) 966-0616

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Dave Deulito
Clinical Social Worker
320 emergency Room Dr. CB#7470
Chapel Hill, Orange County
N.C. 27599-7470
(919) 966-3658
dev@email.unc.edu

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Perrianne DAVIS
DAVIS Psychological Services
5107 Southpark Dr. Suite 203
Durham, Durham County
N.C. 27713
(919) 361-2029

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Leslie Montag
psychiatrist
320 emergency Room Dr. CB#7470
Chapel Hill, Orange County
N.C. 27599-7470
(919) 966-6377

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐

Federal question

☐

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

pay monetary damages for our daughter's life from 19 to life expectancy, damages to our home and our personal property, And personal injury to us with PTSD, emotional and mental damage for the rest of our life for waiting in and finding her.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 12, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Stephanie L Hill
Stephanie Lynn Hill

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Statement of Claim:

Civil Suit:

Negligence

misdiagnose

prescription mistakes

personal injury

Damages

property Damages

Death

Failure to keep our daughter safe

Started Seeing Dave Deetto
for therapy sessions October 16, 2020
to December 17, 2020 for depression
and Anxiety. then referred to
Perrianne Daves October 29, 2022 And
November 7, 2020 for ADHD evaluation
was falsely diagnosed with ADHD,
Severe Depression, and Severe Anxiety.
Then was referred to Leslie Montana
December 4, 2020 And December 17, 2022
who prescribed Adderall XR.

Our daughter wrote in file that
if her condition was to change or
get worse they were to immediately call

her mother included name and phone number. She also disclosed she had suicidal ideation and on November 23, 2022 disclosed she had current thoughts of suicide gave her ADHD medicine with no Anti-Depressant. She did not have ADHD. They went on Christmas break after giving her a 90 day supply the medicine killed our daughter.

The mint Hill police that were involved in her homicide investigation said there are people that have got to be charged for her death.